

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO**

ADELA BAI, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

TCP INTERNATIONAL HOLDINGS LTD.,
KAREL ROBERT DEN DAAS, ELLIS YAN,
and BRIAN CATLETT,

Defendants.

Civil Action No. 1:16-cv-00102-DCN

CLASS ACTION

Judge Donald C. Nugent

MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to N.D. Ohio Civ. R. 83.5(h), Katherine Connor Ferguson (“Ferguson”) hereby moves the court to admit Lesley F. Portnoy *pro hac vice* to appear and participate as counsel in this case for Lead Plaintiff Movant Hai Ngo.

Ferguson represents that Lesley F. Portnoy is a member in good standing of the highest court of California and of New York, as attested by the accompanying affidavit made by Lesley F. Portnoy. This Motion is accompanied by the required \$120.00 fee.

Lesley F. Portnoy understands that, unless expressly excused, he must register for electronic filing with this Court promptly upon the granting of this Motion.

Lesley F. Portnoy’s relevant identifying information is as follows:

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Respectfully submitted,

Dated: January 22, 2016

KOOPERMAN GILLESPIE MENTEL LTD.

By: s/ Katherine Connor Ferguson

Katherine Connor Ferguson

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Counsel for Lead Plaintiff Movant Hai Ngo

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Admit *Pro Hac Vice* was served via the Court's electronic filing system on this 22nd day of January, 2016 to the following counsel:

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